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June 5, 2014

Honorable Ed Kinkeade
U.S. District Court
Northern District of Texas
1100 Commerce St., Rm. 1625
Dallas, Texas 75242-1003

Re: *Cedar Crestone, Inc. ("CCI") vs. Affiliated Computer Services, Inc. ("ACS")*; In the United States District Court for the Northern District of Texas; Civil Action No. 3:12-cv-4673

Dear Judge Kinkeade:

This letter is in response to your June 4, 2014 Order [Dkt. 151] regarding Plaintiff's Motion to Compel Production of Documents from Defendant ("Plaintiff's Motion"). [Dkt. 99.] The parties have resolved all discovery issues in Plaintiff's Motion, except as follows:

- (1) CCI still requests the production of a full, unredacted copy of the contract between CIGNA and ACS/Xerox, in addition to the redacted version already produced (Brief in Support of Plaintiff's Motion, Docket No. 100, at 4); and
- (2) Xerox has represented that it has produced all documents responsive to CCI's Second RFP Nos. 1-4, 7-8, 11, 16-24, 26-28 & 48. Xerox has agreed to provide Bates numbers for responsive documents recently produced in response to these topics. However, that task has not been completed by Xerox as of today. As a result, this issue raised in Plaintiff's Motion is still outstanding.
- (3) Xerox has agreed to produce all documents responsive to Second RFP Nos. 5 (documents relating to performance reviews) and 30 (documents relating to termination/cessation of employment), both of which CCI has limited to 33 named individuals. However, that task has not been completed by Xerox as of today. As a result, this issue raised in Plaintiff's Motion is still outstanding.

Xerox will file a brief 1-3 page response by June 13, 2014 in accordance with your Order.

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If you need anything further from us, please let us know.

Very truly yours,

DYKEMA GOSSETT PLLC



Thomas M. Hanson

Agreed:

/s/ Ann Marie Arcadi
Ann Marie Arcadi

Cc: via email to Ann Marie Arcadi (annmarie.arcadi@klgates.com)